

**Dana Transport
CERCLIS # WVD016116428
Nitro, Putnam County, West Virginia**

**EXECUTIVE SUMMARY
REPORT**

TRIAD Project 04-03-0335

Submitted to:

**West Virginia Department of Environmental Protection
Office of Environmental Remediation
1356 Hansford Street
Charleston, West Virginia 25301**

Submitted by:

TRIAD ENGINEERING, INC.
St. Albans, West Virginia

June 2004

P.O. Box 1435
St. Albans, WV 25177
Phone (304) 755-0721
FAX (304) 755-1880



June 2, 2004

Ms. Pam Hayes
Office of Environmental Remediation
West Virginia Division of Environmental Protection
1356 Hansford Street
Charleston, WV 25301

SUBJECT: *Executive Summary Report-Rev. 1*
Dana Transport, Inc. CERCLIS Site
CERCLIS Number WVD016116428
TRIAD Project No. 04-03-0335

Dear Ms. Hayes,

TRIAD ENGINEERING, INC. is pleased to submit two copies of the revised *Executive Summary Report* for the Dana Transport, Inc. CERCLIS Site. This revised report addresses your comments received June 1, 2004. They consist of:

- Spelling errors found on pages 4 and 11,
- Modifying "source of" to "recipient of" on page 6, and
- Correcting contact phone numbers on page 13.

If you have any questions or desire additional information, please feel free to contact us.

Sincerely,
TRIAD ENGINEERING, INC.

A handwritten signature in black ink that reads "Cassie B. Casto".

Cassie B. Casto
Staff Engineer

A handwritten signature in black ink that reads "Lydia M. Work".

Lydia M. Work
Project Manager/Senior Chemist

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ACRONYM GLOSSARY

bgs	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFR	Code of Federal Regulations
COPC	Contaminant of Potential Concern
EPI	Environmental Priorities Initiative
HRS	Hazard Ranking System
NPDES	National Pollution Discharge Elimination System
NPL	National Priority List
OER	Office of Environmental Remediation
PA	Preliminary Assessment
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act
SCS	Soil Conservation Service
SWMU	Solid Waste Management Unit
TDL	Target Distance Limit
The Site	Dana Transport Site
TRIAD	TRIAD ENGINEERING, INC.
Uh	Urban Land
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
VOC	Volatile Organic Compound
WVDEP	West Virginia Department of Environmental Protection
WVDNR	West Virginia Department of Natural Resources
WWTP	Waste Water Treatment Plant

1.0 INTRODUCTION

TRIAD ENGINEERING, INC. (TRIAD) received Notice to Proceed from the West Virginia Department of Environmental Protection (WVDEP), Division of Land Restoration, Office of Environmental Remediation (OER) on July 18, 2003 to perform various investigatory tasks relative to the Dana Transport Site under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), Pre-Remedial Cooperative Agreement between the United States Environmental Protection Agency (USEPA) and the WVDEP.

The Dana Transport Site (the Site) has Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) site designation WVD016116428 and state data source number (DSNWV-460). The Site was listed on CERCLIS in 1991 as a result of non-compliance hazardous waste management activities. The Site's current CERCLA status is "Active" with "No Further Remedial Action Planned" (NFRAP). The USEPA and WVDEP, OER determined a file review and site reconnaissance was warranted to assess potential risk associated with the Site and to determine if the Site should undergo further investigation under CERCLA. This Executive Summary has been prepared under Task 1, File Review and Task 2, Site Reconnaissance of the approved Work Plan.

Task 1 included a review of the Site file provided by the WVDEP, OER and any information made available by the (USEPA). In addition, a review of all available historical aerial photographs of the Site and surrounding areas, courthouse documents, census records, and geologic publications was performed. Additional research was conducted of listings of local community, health, and regulatory agencies that may provide information and assistance, and internet database searches.

Task 2 included a site reconnaissance to confirm information contained within the OER and USEPA project files, and to observe and document source areas and possible releases of hazardous substances. Particular attention was given to ongoing or proposed activities that may lead to potential human or ecological exposure to CERCLA contaminants.

2.0 SITE DESCRIPTION AND HISTORY

2.1 Site Location

The Dana Transport CERCLIS Site is located along Plant Road in Nitro, Putnam County, West Virginia and encompasses approximately 10-acres. The Site location is depicted on the *Saint Albans, West Virginia United States Geological Survey* (USGS) 7.5-minute quadrangle map and is presented on the following page in **Figure 1, Site Location Map**. Coordinates for the Site are 38°25'37" (38.42697°) north latitude and 81°50'41" (81.84471°) west longitude.

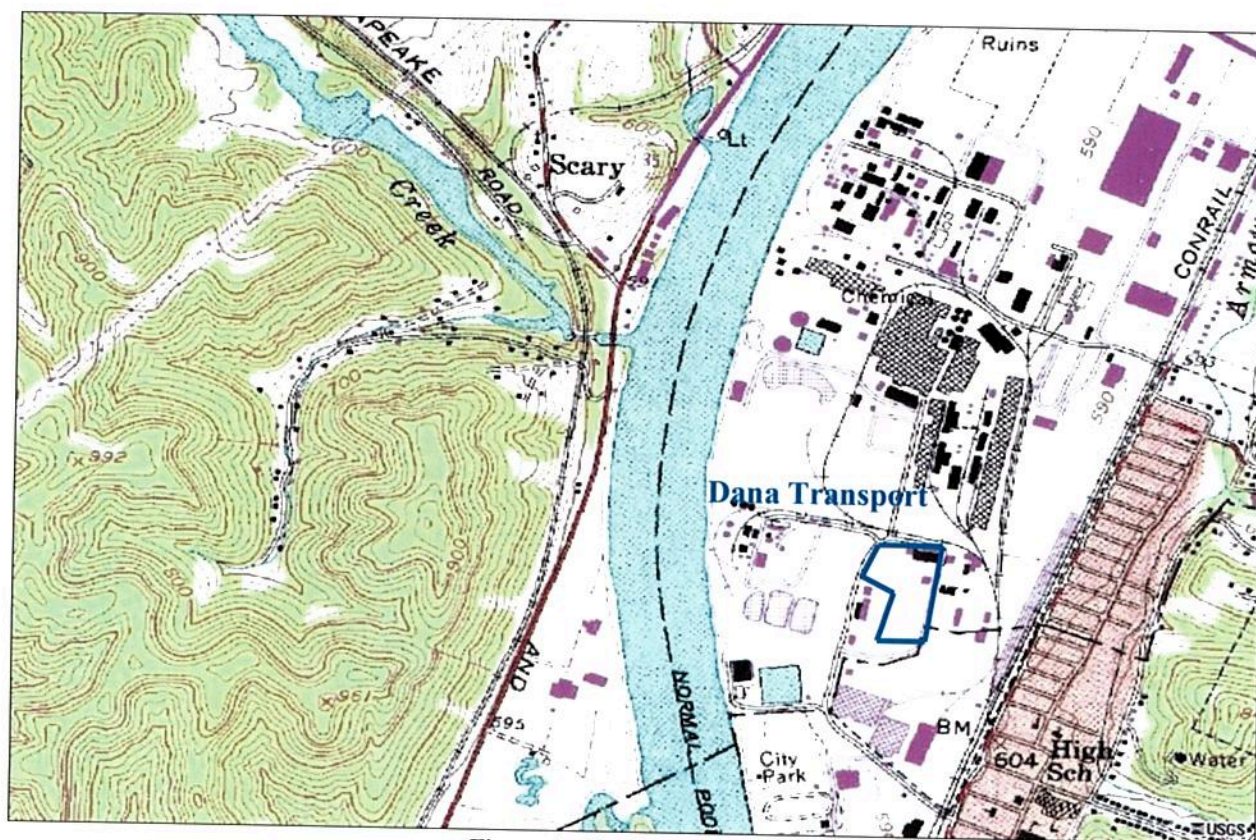


Figure 1. Site Location Map

Dana Transport CERCLIS Site
Nitro, Putnam County, West Virginia
Saint Albans, WV 7.5-Minute Quadrangle

2.2 Site Description

Current site and surrounding area conditions, as noted during the Task 2, Site Reconnaissance, which was performed by Cassie Casto and Lydia Work of TRIAD, Pamela Hayes of the WVDEP, OER; and Mr. Jack Setliff of Dana Transport on August 22, 2003, are as follows:

- The property is bounded on the west by Kinan Corporation and PB&S Chemical Company Inc.
- The property is bounded on the north by Par Industries and to the south by WV Spring & Radiator Company.
- The property is bounded on the east by Vimasco Corporation and Nitro Development Authority. The Nitro Development Authority property makes up part of the Fike Chemical Inc. Superfund site.
- A fence restricts access to the Site along all borders.
- An office building is located at the northeastern portion of the Site.

- With the exception of small patches of soil near the railroad spur and along the parking areas, the Site is covered entirely by concrete or asphalt.
- The southern most portion of the Site is utilized as a parking lot and empty tanker storage area.
- A curbed drum storage area is located centrally along the eastern border of the Site.
- Several groundwater monitoring wells were observed throughout the Site. These wells were installed as part of an ongoing site assessment of the Fike Chemical Inc. Superfund Site.
- Railroad tracks are present near the northwestern portion of the Site and continue along the northern boundary of the Site.
- A wastewater treatment plant, floatation beds, and a lift station operated by Dana Transport are present on-site and are located centrally at the Site.
- Two wash bay buildings are present on-site and are also located centrally on-site.
- A drum storage trailer is present on-site near the northwestern portion of the Site.
- A maintenance garage is also located centrally at the Site. This is where routine maintenance on trucks and miscellaneous machinery occurs.

A site sketch developed by the WVDNR in 1990 during a Preliminary Assessment (PA) is presented on the following page as **Figure 2, Site Sketch**. The site sketch accurately shows the current site conditions. Areas of potential environmental concern are identified on the map as SWMU#1 through SWMU #6 (Solid Waste Management Units). Pictures were not taken at the Site during the site reconnaissance as per the request of Mr. Jack Setliff.

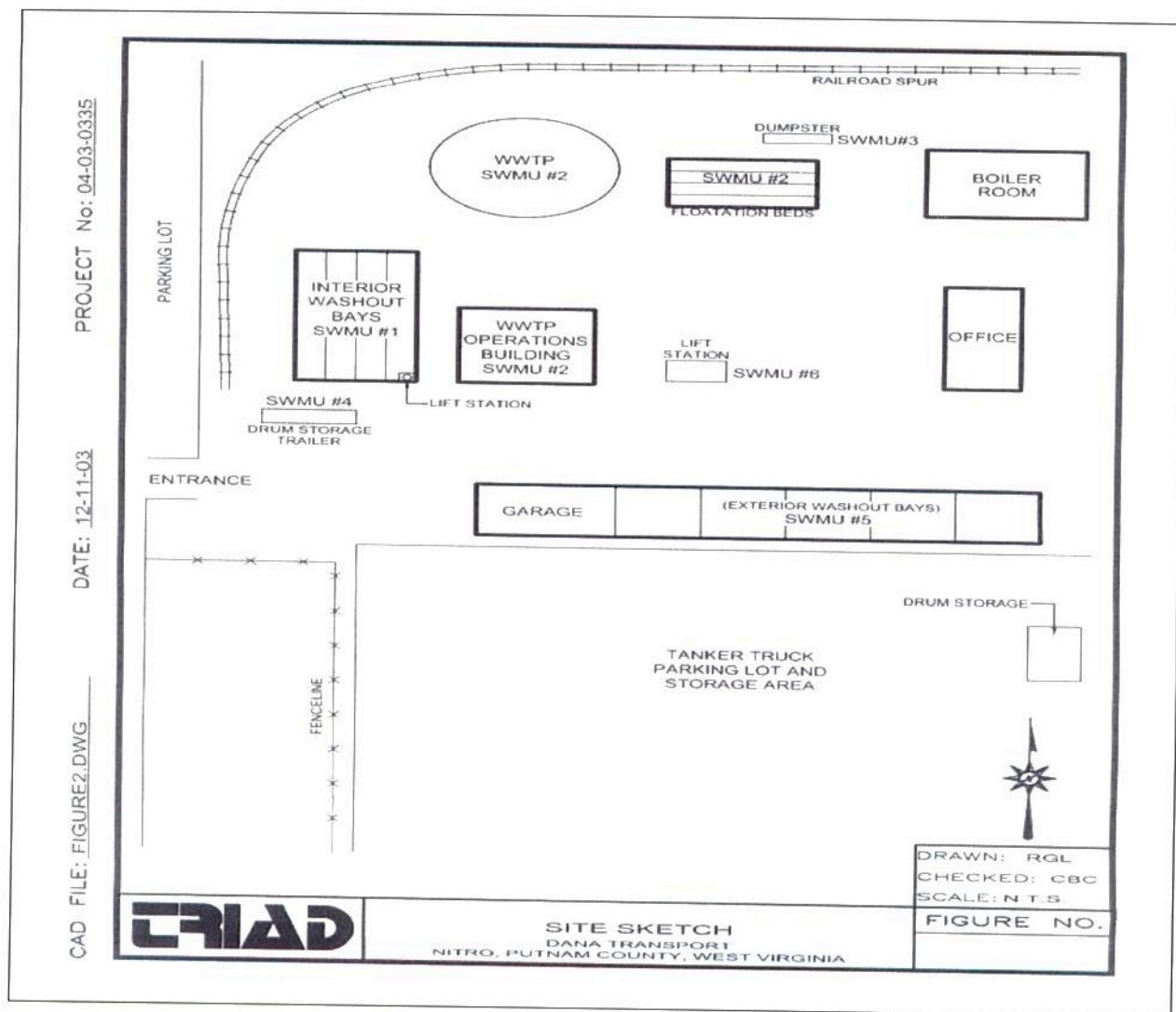


Figure 2. Site Sketch (Preliminary Assessment April 29, 1990)

**Dana Transport CERCLIS Site
Nitro, Putnam County, West Virginia**

2.3 Operational Activities

The Dana Transport CERCLIS Site is an active, tanker-truck decontamination facility, which has been operated by Dana Transport from 1987 to the present. Prior to 1987, the Site has been used for tanker-truck decontamination operations by other entities since 1955. Current operations at the Site consist of decontaminating liquid filled tankers by using a wash bay with high pressure washers. Waste water from this process is sent to an on-site water treatment plant where the water is treated and released into the Kanawha River. Residual heels from tankers are removed and put into labeled drums and stored for resale. According to deeds and tax maps on record at the Putnam County Courthouse, Winfield, West Virginia, the Dana Transport CERCLIS Site encompasses three parcels of property that make up the Site and are currently owned by the following:

- Dana Container, Inc. (Parcels 91 and 92.1; 4.920 and 2.96 acres respectively)

➤ Nitro Development Authority (Parcel 91.1; 0.928 acres)

Property currently owned by Dana Container, Inc. was acquired from Coastal Tank Lines, Inc. in 1987 following Coastal Tank Lines, Inc. bankruptcy in 1986. Coastal Tank Lines, Inc. also utilized the property as a tanker-truck cleaning facility from 1955 until 1987. Under Coastal Tank Lines, Inc. ownership, the Site was part of the civil action case 80-2897 in November 1982, *United States of America v. Fike Chemical, CST Inc., and Coastal Tank Lines, Inc.* The current status or basis of this case could not be ascertained in either the WVDEP project files or Putnam County Courthouse.

The property currently owned by Nitro Development Authority lies along Plant Road and is currently leased by Dana Transport. The Nitro Development Authority parcel was obtained in 2002 from BF Gravely and Son and was once owned by Coastal Tank Lines, Inc. This area has been paved and is currently used as a parking lot.

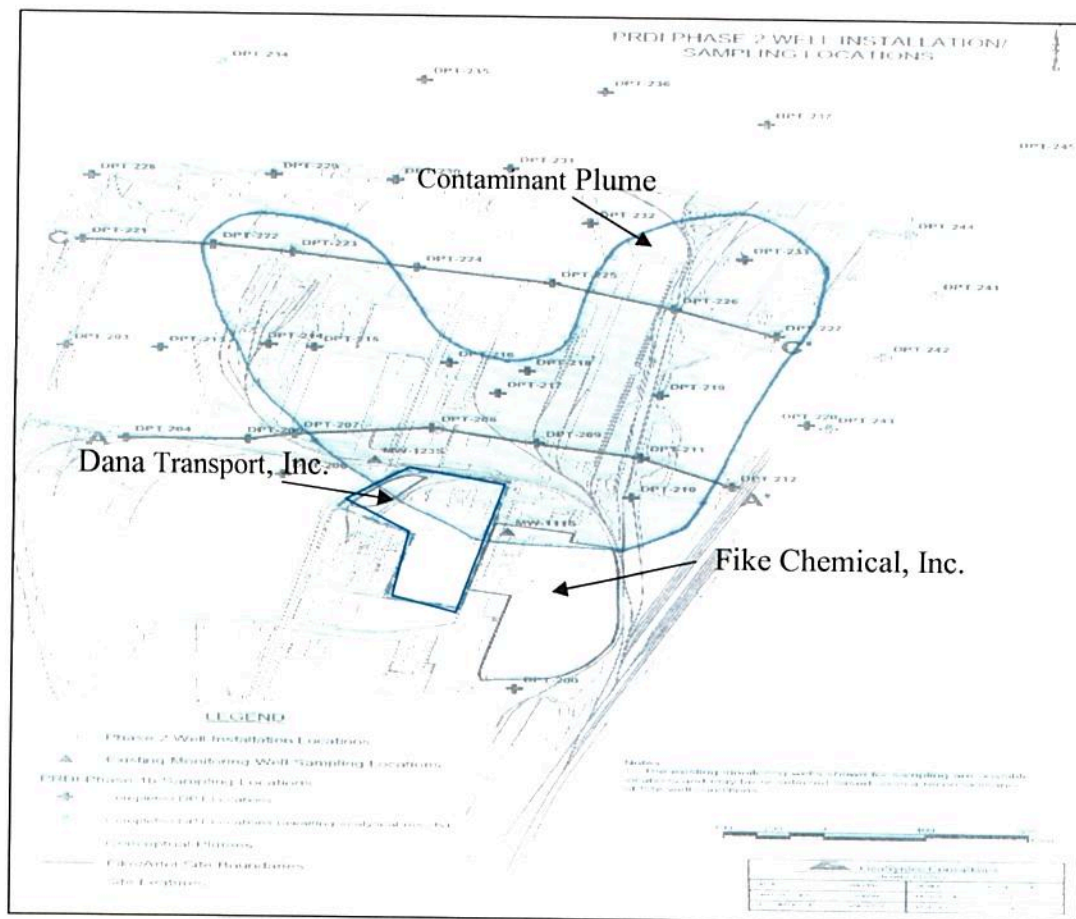


Figure 3. Phase 2 Well Installation/Sampling Locations (GeoSyntec Consultants 2003)

**Fike Chemical Inc. Conceptual Plume Location
Nitro, Putnam County, West Virginia**

The Fike Chemical Inc. property, which is adjacent and upgradient of the Dana Transport Site, is listed under CERCLA as a National Priority List Site (NPL) and continues to be an area of investigation. It appears that Fike Chemical Inc. has a groundwater contaminant plume that extends beneath a portion of the Dana Transport Site.

A United States Geological Survey (USGS) aerial photograph (dated 1996) of the Dana Transport Site and adjoining areas is presented below as **Figure 4. 1996 Aerial Photograph**. As depicted in the photograph, the Site lies in a heavily industrialized area. The lack of vegetation at the Site is a result of the Site being almost entirely covered by concrete or asphalt. The Kanawha River is visible approximately 1/3-mile west of the Site and is the recipient of treated effluent discharge from the Dana Transport WWTP.



Figure 4. 1996 Aerial Photograph
Dana Transport CERCLIS Site
Nitro, Putnam County, West Virginia

2.4 Solid Waste Management Units

Six solid waste management units (SWMU) were identified during the *Preliminary Assessment* conducted by the WVDNR in April 1990. These SWMUs are identified on **Figure 2, Site Sketch**.

2.4.1 SWMU 1, Interior Washout Bay

A decontamination bay building, which is located toward the northwestern portion of the Site, contains four bays where tanker-trucks are decontaminated and washed out. Tanker-trucks are drained and washed with a caustic solution. Wastewater from this process is

collected by drains located in the floor of the bay areas and channeled to a lift station. From the lift station, waste water is directed to the Wastewater Treatment Plant onsite for treatment and release to the Kanawha River Under NPDES permit number WV0050130.

2.4.2 SWMU 2, The Wastewater Treatment Plant (WWTP)

A wastewater treatment plant, which is located within the north central portion of the Site includes an operations lab building, one equalization neutralization plant, and six floatation-solidification beds. The Wastewater Treatment Plant is utilized to treat waste water generated from the decontamination of tanker-trucks in the bay building and the exterior washout bays.

2.4.3 SWMU 3, Dumpster

The dumpster is located adjacent to the solidification beds and is approximately 10 cubic yards in volume. Solids collected in the solidification beds from the neutralization-equalization process are periodically transferred to this dumpster for further disposal.

2.4.4 SWMU 4, Drum Storage Trailer

A 40 foot box trailer is located southwest of the decontamination bay building, and is utilized as hazardous and non-hazardous waste drum storage. Drum contents are that of the tanker-truck materials removed and containerized before decontamination in the washout bay building.

2.4.5 SWMU 5, Exterior Washout Bays

A building containing five wash-out bays is located toward the center of the Site. Exterior portions of the tanker-trucks are washed in this building. Wastewater from this process is channeled to the Wastewater Treatment Plant on-site.

2.4.6 SWMU 6, Lift Station

This lift station is located between the centrally located wash-out bay building and the Wastewater Treatment Plant. Waste water from the external decontamination of the tanker-trucks is channeled to the lift station and sent to the Wastewater Treatment Plant for processing.

2.5 Site Investigations and Regulatory History

The Dana Transport Site is regulated under the Resource Conservation and Recovery Act (RCRA) laws. Several RCRA investigations and inspections have been performed at the Site and are listed below.

November 19, 1980 Coastal Tank Lines, Inc.

Coastal Tank Lines, Inc. filed a Notification of Hazardous Waste Activity Form with the USEPA for generation, transportation, and storage of hazardous waste. The USEPA assigned Coastal Tank Lines, Inc. EPA Identification Number WVD016116428.

April 7, 1986, Coastal Tank Lines, Inc.

USEPA issued Coastal Tank Lines, Inc. a Notice of Non-compliance based upon the following violations:

- West Virginia Administrative Regulations, Section 6.4.1(b), Chapter 20, Article 5E, Series XV; failure to keep annual reports on file at the facility.
- Title 40 Code of Federal Regulations (CFR) Series 265, Part 35; failure to submit a copy of the Contingency Plan to local police, fire departments, hospitals, and emergency response teams.
- Title 40 CFR 265.13(b); failure to maintain a waste analysis plan.
- Title 40 CFR 14(b); failure to control entry into the facility by either a 24-hour surveillance system, artificial or natural boundary, or means to control entry at all times.
- Title 40 CFR 265.14(c); failure to post a restricted access sign at each entrance to the active portion of the facility.
- Title 40 CFR 265.16(d)(1); failure to maintain names and job titles of those employees involved with the handling of hazardous waste.
- Title 40 CFR 265.16(d)(3); failure to maintain training records at the facility.
- Title 40 CFR 265.72(b)(2); failure to maintain an operating log and location of each hazardous waste managed at the facility.
- West Virginia Administrative Regulations, Section 6.1.1; failure to make a determination of unidentifiable wastes present on-site.
- Title 40 CFR 265.15(d); failure to maintain records of all inspections on-site.

June 5, 1987, Dana Transport, Inc.

The West Virginia Division of Natural Resources (WVDNR) issued Dana Transport, Inc. a Notice of Non-compliance based upon the following violations discovered during the May 13, 1987 inspection:

- West Virginia Hazardous Waste Management Regulations, Section 4.1.a; failure to notify the Chief of hazardous waste activity.
- Title 40 CFR 265.16; failure to establish and maintain records of contingency plans, employee training, and arrangements with local emergency response authorities.
- West Virginia Hazardous Waste Management Regulations, Section 6.1.1.b; failure to make a determination of waste present on site and having manifested listed wastes as ignitable wastes.

October, 21, 1987, Dana Transport, Inc.

WVDNR issued Dana Transport, Inc. a Notice of Non-compliance based upon the following violations discovered during the August 25, 1987 inspection:

- Title 40 CFR 265.16(d)(1); failure to maintain a record of names and job titles of those employees involved with hazardous waste management.
- Title 40 CFR 265.16(d)(2); failure to maintain a record of the position description for each job title of the hazardous waste handling employees.
- Title 40 CFR 265.16(d)(3); failure to maintain a written description of the type and frequency of employee training.
- Title 40 CFR 265.52(c); failure to maintain a contingency plan at the facility detailing arrangement agreed to by local emergency response.

- Title 40 CFR 265.52(d); failure to maintain a contingency plan with local emergency response names, phone numbers, and addresses.
- Title 40 CFR 265.53; failure to submit copies of the contingency plan to applicable local emergency response.
- Title 40 CFR 262, Appendix; mislabeling of drums with inaccurate identification numbers.

December 7, 1987, Dana Transport, Inc.

WVDNR issued Dana Transport, Inc. with an Order Number HW-108-87, based upon the following violations:

- West Virginia Hazardous Waste Management Regulations, Section 4.1.a; failure to notify the Chief of hazardous waste activity as per an inspection made on November 18, 1986.
- Title 40 CFR 265.16; failure to keep proper records.
- Meeting held on March 26, 1987 to discuss previously discovered deficiencies and how to correct them; Dana agreed to correct deficiencies within forty five days.
- An inspection on May 13, 1987 disclosed that these deficiencies were not corrected.
- West Virginia Hazardous Waste Management Regulations, Section 6.1.1b; failure to make waste determinations, and drums containing listed wastes were manifested as ignitable waste.

April 19, 1989, Dana Transport, Inc.

WVDNR issued an Order No. HW-165-89 for non-compliance to the Hazardous Waste Management Act of the West Virginia Code.

April 29, 1990, West Virginia Division of Natural Resources Waste Management Section

WVDNR prepared a Preliminary Assessment of the Dana Transport Site and summarized there should be no further action, due to RCRA enforcement and sufficient containment of materials on-site.

February 1, 1991, United States Environmental Agency

USEPA placed Dana Transport in CERCLIS as an environmental priorities initiative site (EPI) due to a coordinated effort between the site assessment section and the waste management branch (RCRA). Dana Transport was placed in CERCLIS for pre-remedial investigative work.

May 5, 2000, EPA Region III

James Hargett from the EPA Region III office prepared a remedial site assessment decision and assigned no further response action planned to the Dana Transport Site based upon the following reasons:

- No documented spills.
- No samples.
- Regulated by RCRA.
- No hazard ranking system source.

2.6 Potentially Responsible Parties (PRPs)

The Site has been in the area of commercial and industrial development for approximately 85 years. Based upon information obtained from the Putnam County Courthouse, the following may be potentially responsible parties:

- Dana Containers, Inc.
- Coastal Tank Lines, Inc.
- Nitro Development Authority

2.7 Contaminants of Potential Concern

Based on the inspection and investigations performed, as well as the types of wastes handled by Dana Transport, the historical contaminants of potential concern (COPC) are as follows:

- Volatiles
- Semivolatiles
- Metals

The Site has a current National Pollution Discharge Elimination System (NPDES) permit. The permit is issued for the WWTP and stormwater runoff. The following are parameters for which Dana Transport is regulated according to the USEPA Enforcement and Compliance History

Online (ECHO) information:

- Oil and grease
- Chemical Oxygen Demand
- Total Suspended Solids
- Biochemical Oxygen Demand
- Zinc (total)
- Flow
- Nitrogen, Ammonia (total)
- Copper (total)
- Mercury (total)
- Fluoranthene
- Phenanthrene
- Toxicity (Ceriodaphnia Acute)
- Fecal Coliform
- Priority Pollutants (total)

Based upon review of ECHO, Dana Transport is currently in compliance. There have been no reported spills at the Site and although the facility still generates hazardous waste, it would appear that the SWMU's on site would contain any released contaminants in the event of a spill.

3.0 CONTAMINANT MIGRATION PATHWAYS AND RECEPTORS

3.1 Groundwater

The Site is underlain by unconsolidated alluvial deposits consisting of silt, sand, and gravel to depths of approximately 50-feet below ground surface. These unconsolidated deposits are underlain by consolidated bedrock of the Pennsylvania-aged Conemaugh Group. Groundwater at

the Site would be expected to be encountered in relatively near-surface perched aquifers associated with discrete sand and gravel zones. The groundwater potentiometric surface would be expected to be encountered at depths of about 25 to 30 feet below ground surface. The direction of groundwater flow would be expected to be towards the Kanawha River; although, periodic reversals of groundwater flow could occur during high water elevations in the Kanawha River. Finally, it would be expected that the groundwater aquifer would be in direct hydraulic contact with the Kanawha River. Due to the Site soils being covered by concrete and asphalt, groundwater contamination from sources on site would be unlikely. In addition, a large portion of the Site, as well as downgradient of the Site, lies within the Fike Chemical, Inc. contaminated groundwater plume and is receiving oversight from both the USEPA and the WVDEP. See **Figure 3. Phase 2 Well Installation/Sampling Locations (GeoSyntec Consultants, 2003).**

The 36,634 people that reside within four miles of the Site receive their potable water supplies from municipal water services that are upgradient and/or upstream of the Site. There are no known groundwater Hazard Ranking System (HRS) targets within the target distance limit (TDL) of four miles of the Site. Therefore, there does not appear to be the potential for human exposure to potentially contaminated groundwater due to direct exposure (oral ingestion or dermal contact); however, there could be potential inhalation exposure due to volatilization of VOCs from groundwater to either indoor or outdoor (ambient) air.

3.2 Surface Water

Surface water runoff discharges from the Site to the Kanawha River via the on-site WWTP. A Storm Water NPDES permit has been issued to the Site for discharge into the Kanawha River. There are no surface water intakes along the Kanawha River downstream within the TDL of 15 miles of the Site. The Kanawha River is used for recreational activities such as swimming, boating, and fishing. However, the Kanawha River is currently under a "Do not eat" fish advisory adjacent to and downgradient of the Site. The federally registered endangered and threatened species that can be found in Putnam County are the bald eagle and Indiana bat. Fish are a staple food in the diets of these animals.

Wetlands are minimal along the Kanawha River Valley and are not present within the one mile TDL downstream of the Site. The Site is not considered to be within an ecologically sensitive area.

3.3 Soil

Soil at the Site is classified as an urban land (Uh) soil type by the United States Department of Agriculture (USDA), Soil Conservation Service (SCS). This soil type is associated with flat to gently sloping areas with more than 85 percent of the surface covered by impervious material (**Figure 5, Soil Survey Map**).

Human exposure to CERCLA contaminants in surface and subsurface soil at the Site are unlikely due to the majority of the Site being covered with concrete or asphalt. However, during non-routine construction activities that would involve exposing these soils, on-site workers and occasional trespassers could be exposed to CERCLA contaminants through potential incidental direct contact (incidental oral ingestion and dermal contact), potential fugitive dust inhalation,

and potential air inhalation of VOCs due to volatilization from surface and subsurface soil to indoor and outdoor (ambient) air. Furthermore, off-site workers, construction/utility workers, and occasional trespasser could be exposed to CERCLA contaminants associated with the potential off-site migration of fugitive dust and volatiles, resulting in potential fugitive dust inhalation and/or inhalation of volatiles in both indoor and outdoor (ambient) air.

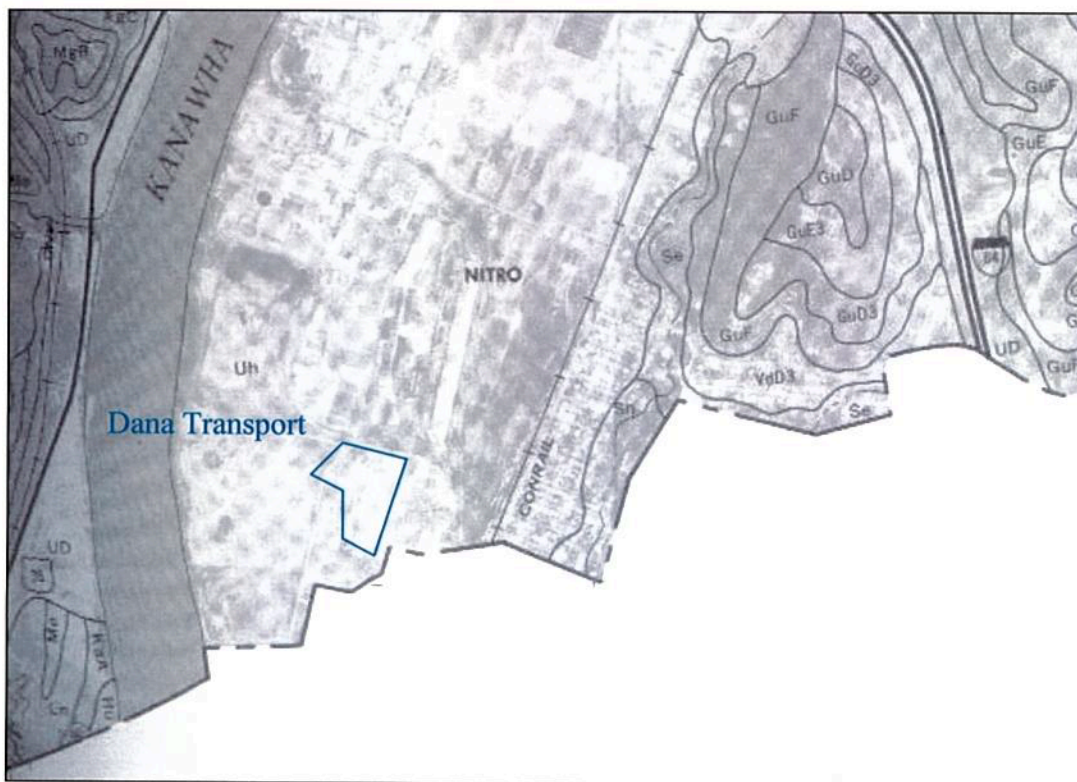


Figure 5. Soil Survey Map
Dana Transport CERCLIS Site
Nitro, Putnam County, West Virginia

3.4 Air

Any release of contaminants to the atmosphere would be minimal due to the extensive ground cover at the Site.

(b) (5)

5.0 RECOMMEDATIONS

The Dana Transport, Inc. CERCLIS Site does not appear to pose an environmental or human health threat. Because (b) (5) and the Site is regulated under RCRA, the Dana Transport, Inc. CERCLIS Site is recommended for no further action and should be archived in CERCLIS.

6.0 CONTACT INFORMATION

The following points of contact could provide pertinent information concerning historical information and environmental risks associated with the Dana Transport CERCLA Site.

United States Government Contacts

James Hargett, 3HS34
Region III PM, USEPA
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3305

State Contacts

Putnam County Health Department
State Route 34
Hurricane, WV 25526
(304) 757-2541

Richard Hackney, Inspector
WVDEP, OER Environmental Enforcement
PO Box 662
Teays Valley, WV 25569
(304) 757-1693

Chris Gatens, Inspector
WVDEP, OER
1356 Hansford Street
Charleston, WV 25301-1404
(304) 558-2508

Pam Hayes, Project Manager
WVDEP, OER,
1356 Hansford Street
Charleston, WV 25301
(304) 558-2508

Charlie Moses, Environmental Inspection Supervisor
WVDEP, Environmental Enforcement
PO Box 662
Teays Valley, WV 25569
(304) 757-1693

Mark Slusarski, Geologist
WVDEP, OER
1356 Hansford Street
Charleston, WV 25301
(304) 558-2508

PFE ORIGINAL

Potentially Responsible Parties

Dana Transport, Inc..
 Jack Setliff
 Plant Road
 Nitro, WV 25143
 (304) 755-3800

Coastal Tank Lines, Inc.
 (No longer in business)

Nitro Development Authority
 (unknown)

7.0 REFERENCES

Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual (Part A), Interim Final, December 1989.

Hazard Ranking System; Final Rule. United State Environmental Protection Agency, December 14, 1990.

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PFE 001234

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